

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**FROSTINE NEWBERRY, an Individual, §  
RICHARD NEWBERRY, an Individual, §  
§  
Plaintiffs, §  
§  
v. §  
§  
DISCOUNT WASTE, INC., a §  
Corporation, and ROSA LOPEZ, doing §  
business as A & R RENT-A-FENCE, a §  
sole proprietorship, §  
§  
Defendants. §**

**Case No. 4:19-cv-147  
Judge Mazzant**

**DEFENDANT ROSA LOPEZ D/B/A A & R RENT-A-FENCE'S  
FIRST AMENDED VIDEO DEPOSITION DESIGNATIONS**

Defendant Rosa Lopez d/b/a A&R Rent-A-Fence, (“Defendant”) hereby submits the following page/line designations of video deposition testimony that may be used at the trial of this matter:

**Video Deposition of Joe DeFilippo taken on November 14, 2019:**

<b>From Page/Line</b>	<b>To Page/Line</b>
7:4	7:6
9:15	9:22
16:14	17:15
26:17	28:6
28:12	29:14
30:19	31:10
32:2	32:10
33:2	33:22
34:11	35:23
36:8	38:13
39:4	39:19
41:11	42:2
42:25	43:7
46:1	49:7
49:19	50:8
63:16	63:20

67:2	67:14
71:5	73:3
80:8	81:15
85:11	87:5
90:3	90:8
91:5	91:10
92:2	94:16
95:24	96:5
96:19	97:4
98:9	98:23
99:7	99:24
106:11	106:15
106:25	107:8
107:25	108:13
109:18	110:8
111:17	112:7
113:14	116:14
121:11	124:21
130:3	132:23

**Video Deposition of Norman Cooper taken on March, 9, 2020:**

<b>From Page/Line</b>	<b>To Page/Line</b>
22:5	22:18
25:16	28:10
28:19	36:3
38:3	40:3
40:21	41:23
46:17	48:14
51:5	51:20
52:13	53:3
55:18	57:5
57:11	63:6
63:23	64:6
65:7	66:11
70:1	70:12
70:20	74:15
77:11	78:2
78:10	79:8
81:20	82:5
83:5	86:12

Dated: May 18, 2020

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. J. Palmer", written over a horizontal line.

By: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I certify that on this the 18<sup>th</sup> day of May, 2020, a true and correct copy of the foregoing document was served via email on the following parties in accordance with the Federal Rules of Civil Procedure:

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